

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

Elizabeth A. Rodawalt,

PLAINTIFF,

v.

Primeritus Financial Services, Inc.,

DEFENDANT.

**DECLARATION OF KATHLEEN THORNTON**

1. My name is Kathleen Thornton. I am the VP and General Counsel of Primeritus Financial Services, Inc. ("Primeritus"). I have held this title since 2021. This Declaration is based upon my personal knowledge.

2. Primeritus has its principal place of business in Tennessee.

3. Primeritus was organized as a corporation in Delaware.

4. Primeritus has offices only in Tennessee, North Carolina, and Texas.

5. Primeritus is neither a vehicle repossession agency nor a vehicle repossession agent.

6. Primeritus does not employ persons who perform vehicle repossessions.

7. Primeritus is not a debt collector. It does not collect or attempt to collect, directly or indirectly, debts owed or asserted to be owed to another. Primeritus does not employ persons who collect debts.

8. The person identified as "Carl" in paragraph 11 of the Complaint in this action was never an employee, agent, or representative of Primeritus.

9. Primeritus does not have offices in Ohio.

10. Primeritus does not have affiliates with offices in Ohio.

11. Primeritus does not own or lease property in Ohio.

12. Primeritus does not maintain a bank account in Ohio.

13. Primeritus does not have an Ohio telephone number.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 4, 2024

Kath M. Shu